

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Civ. No. 25-134

\$179,371.76 IN FUNDS FROM COINBASE
CRYPTOCURRENCY EXCHANGE ACCOUNT
UUID x2576 BELONGING TO ALEXANDRA
LANE,

Defendants-in-rem.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

Plaintiff, United States of America, brings this complaint in accordance with Supplemental Rule G(2) of the Supplemental Rules for Certain Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action to forfeit and condemn to the use and benefit of the United States of America property involved in violations of 18 U.S.C. § 1030 that is subject to civil forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

DEFENDANTS-IN-REM

2. The *defendants-in-rem* consist of the following property: \$179,371.76 in funds from Coinbase cryptocurrency exchange account UUID x2576 belonging to Alexandra Lane (hereinafter, "Defendant Property").

3. Defendant Property was seized by the Federal Bureau of Investigation (FBI) in the District of New Mexico on August 19, 2024.

4. Upon filing of this complaint, the United States will arrest the Defendant

Property by execution of a Warrant for Arrest *in Rem* in the District of New Mexico.

5. Defendant Property is now, and during the pendency of this action will be, in the jurisdiction of this Court.

JURISDICTION AND VENUE

6. The United States District Court for the District of New Mexico has subject matter jurisdiction under 28 U.S.C. §§ 1345, 1355(a) and 1356.

7. Venue for this civil forfeiture action is proper in this district pursuant to 28 U.S.C. §§ 1355 and 1395, as acts or omissions giving rise to the forfeiture took place in this district and the property is found in this district.

FACTS

Evidence of unauthorized withdrawals from victim K.W.'s cryptocurrency wallet to the account containing Defendant property and subsequent transfers of funds to account x2237 at Bank of America

8. During this investigation, Special Agent Tyler Derderian of the FBI met more than once with K.W., a resident of Rio Rancho, New Mexico. K.W. told Special Agent Derderian that K.W. invests in cryptocurrency. In April 2024, K.W. advised Special Agent Derderian about attempted breaches of one of his cryptocurrency accounts with a balance at that time of approximately \$7,000,000. Then, on July 31, 2024, K.W. notified Special Agent Derderian via email of certain unauthorized withdrawals on or about July 26, 2024, from one of

his cryptocurrency ledger wallets¹ nearing the equivalent of \$3,000,000. Special Agent Derderian has learned the address of this wallet² begins with “bc1qu.”

9. On August 5, 2024, K.W. emailed Special Agent Derderian three cryptocurrency transaction hashes detailing the theft of 36 Bitcoin (“BTC”) from a ledger wallet he controlled:

Transaction 1:

f23eca0e4b7b98aaab8ffd61674dc6cc88f66208ee2ddcd673e22da1a8f01cfb

Transaction 2:

bdcfd5e4661c73a89addb41ffeeb628c759bd1371a6462d82ac0fbc78cc7ab33

Transaction 3:

3dcd974b37f6708e9b18857679343be1096814609f9994d9174f71a3139b7812 (Tx 3).

10. Special Agent Derderian is experienced in cryptocurrency tracing using Chainalysis. Using commercially available tools, including, third-party software, he conducted tracing analysis on the three unauthorized transactions K.W. reported to him. This analysis showed K.W.’s ledger wallet had 50 Bitcoins prior to July 26, 2024. Within the span of one hour on July 26, 2024, there were three withdrawals from the ledger wallet totaling 36 Bitcoin, the equivalent of approximately \$2.43 million. Each of these withdrawals had the same receiving address.

¹ According to crypto.com, “Cryptocurrency wallets store users’ public and private keys while providing an easy-to-use interface to manage crypto balances. They also support cryptocurrency transfers through the blockchain. Some wallets even allow users to perform certain actions with their crypto assets, such as buying and selling or interacting with decentralized applications (dapps).”

² More information about cryptocurrency wallet addresses is available at <https://greenlight.com/learning-center/investing/what-is-a-wallet-address>

Tx #	Receiving Address	Bitcoin s	USD Value
Tx 1	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	1	\$67,491.55
Tx 2	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	10	\$674,916.00
Tx 3	bc1qy4lgxy6czehvp0m82ramjr6wlcekxy2x4ehpk g	25	\$1,687,288.75

11. The funds first sent to these receiving accounts were then subsequently transferred out to several intermediary wallets before being transferred to nine different deposit addresses held at Coinbase, as listed below:

1	3PjAAy6dx78A6oLuRHjDv72c1ZrNKMqhrj
2	3JrvBjXrachwbHM8zs33TQHQQ8n3Pp9Tm9
3	3JLacy2QS7EUL91jG4grtZfnwEvPkkeUTy
4	3KyRNUqEX7YKkVzMiqcLXBRxMsRH85kDLh
5	3GMtZsgmFE9xNPPVqoEJ9wcU6nNSXyDhGN
6	3Qhf6QpJ532ekX6h1va8euxmSDSzXMMXPN
7	3PpqSkPSrmyRrmz1NEwPbtHsLeiDrqN1GW
8	34h67hqnsxKH6LiLUgka26qiw26XwX22uh
9	3731CFeSHdCRRMkCErfNXaHyYAXa4cniys

12. On August 6, 2024, Special Agent Derderian was informed by a representative of Coinbase that all deposit addresses were associated with the same Coinbase User ID, 64cff09484cbb630fbcc2576, which linked to the account containing the Defendant Property.

13. Later on August 6, 2024, Coinbase provided all account records associated with the account containing the Defendant Property, including account holder information, as detailed below:

Universally Unique Identifier (“UUID”): 64cff09484cbb630fbcc2576
 Associated Email Address: alex.q.roth@gmail.com
 Name: Alexandra Roth
 Physical Address: 41 Central Ave, Montclair, NJ 07042

14. The account balance included \$178,167.14 in U.S. dollars, a separate asset of \$680,207.83 in U.S. dollar coins (USDC), and a separate asset of \$9.53 worth of BTC.³

15. Special Agent Derderian then examined a transaction history provided by Coinbase showing BTC wallets associated with the account containing the Defendant Property were created beginning in July 2024. This transaction history validated the tracing analysis Special Agent Derderian previously conducted and confirmed the blockchain transactions listed below were deposited into the account containing the Defendant Property.

Tx. 1 07/26/2024	Tx Hash: d16b85e016f36a977ab1da644e0842ed6533e42666675d973432d53a25b2ed51 Deposit Address: 3PjAAy6dx78A6oLuRHjDv72c1ZrNKMqhrj Amount: \$955.80
Tx 2	Tx Hash:

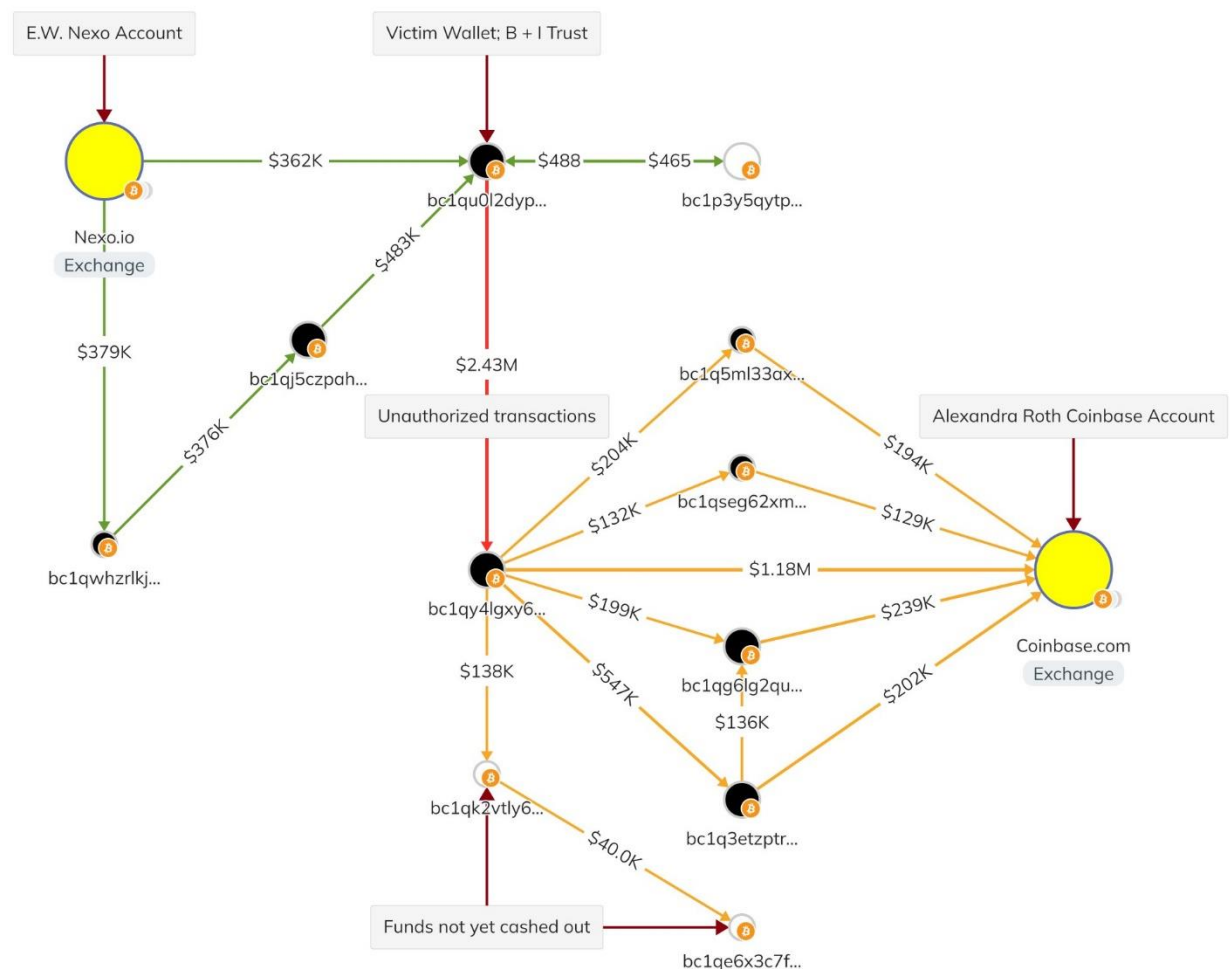
³ According to coinbase.com, USDC is a type of cryptocurrency that is referred to as a fiat-backed stablecoin, meaning it is backed by reserve assets in the traditional financial system, such as cash, cash equivalents, or securities.

024	07/31/2	<p>ae701245d37f065a582760f6858269c14cf5edcf387c98515c8d5b9c8c74fd0e</p> <p>Deposit Address: 3JrvBjXrachwbHM8zs33TQHQQ8n3Pp9Tm9</p> <p>Amount: \$201,368.88</p>
024	Tx 3 08/01/2	<p>Tx Hash: 7b162f3ab96294efc7ad0b784bca145643c246d30d45b3107fecc1003cf3df14</p> <p>Deposit Address: 3JLacy2QS7EUL91jG4grtZfnwEvPkkeUTy</p> <p>Amount: \$193,852.92</p>
024	Tx 4 07/29/2	<p>Tx Hash: 9fbc69a30d62a42a0df0f9e30bddb2c03ea062f469c0a55e9b51914ab5e35128</p> <p>Deposit Address: 3KyRNuqEX7YKkVzMiqcLXBRxMsRH85kDLh</p> <p>Amount: \$136,505.50</p>
024	Tx 5 07/30/2	<p>Tx Hash: 9f24cff23d3555bc1626923d7b7369d0a5b03a8bc3f8a8e63e6c1c3ecf2bc574</p> <p>Deposit Address: 3GMtZsgmFE9xNPpVqoEJ9wcU6nNSXyDhGN</p> <p>Amount: \$330,577.80</p>
024	Tx 6 07/31/2	<p>Tx Hash: 9efed6ed1673cb4520353a29083f0a976aae4d71b305a46fbc8a64e9188381ba</p> <p>Deposit Address: 3Qhf6QpJ532ekX6h1va8euxmSDSzXMMXPN</p> <p>Amount:</p>

	\$330,570.30
Tx 7 07/31/2 024	Tx Hash: 20b3cd709c2ff019bece33d59c84b1cdbc641c92b21ecd1e069eb49 065cf7a85 Deposit Address: 3PpqSkPSrmyRrmz1NEwPbtHsLeiDrqN1GW Amount: \$382,329.25
Tx 8 08/01/2 024	Tx Hash: 818e6870e24b1035d9b4ecbdc220ddfc1a5822fbf2b6b7e27080617 5bb995668 Deposit Address: 34h67hqnsxKH6LiLUgka26qiw26XwX22uh Amount: \$129,237.58
Tx 9 07/31/2 024	Tx Hash: bd03d8730b3d2ff3802989e833061bfe3345394d41754ea72d740258f6e 1e2bc Deposit Address: 3731CFeSHdCRRMkCErfNXaHyYAXa4cniys Amount: \$203,408.23

16. Special Agent Derderian then learned through examination of Coinbase records that much of the money received by the account containing the Defendant Property was quickly transferred to external accounts. In particular, these records showed seven withdrawals totaling \$1,162,371.62 between July 27 and July 31, 2024, to a Bank of America account also in the name of Alexandra Roth.

17. The diagram pasted below summarizes Special Agent Derderian's asset tracing in this case. K.W. initiated the transfers in green. The allegedly unauthorized transactions are noted in red. The transactions in gold follow the allegedly stolen funds until cash out.



Verification the compromised cryptocurrency wallet belongs to victim K.W.

18. Special Agent Derderian has reviewed an email provided by K.W.'s wife, E.W., showing transactions in January 2023 to fund K.W.'s cryptocurrency wallet. This email showed funds from an account in E.W.'s name at Nexo, a cryptocurrency exchange platform, going to

K.W.'s cryptocurrency exchange wallet.⁴ Special Agent Derderian has validated these transactions with blockchain analysis, as detailed below.

Date	Receiving Address	Bitcoins
1/3/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrkxk	0.006
1/3/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrkxk	28.99
1/10/2023	bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrkxk	20.99

19. Special Agent Derderian is further informed by K.W. that he performed test transactions to verify that he had regained control of his cryptocurrency wallet. K.W. advised Special Agent Derderian that he then made a transferred of 0.00862024 BTC. The deposit and withdrawal transactions appear viewable on the public blockchain as follows:

24	<p>Tx 1 08/06/20</p> <p>Tx Hash: d87c360f58cf65e0059c592156e86e8a42557409cda660aa810a105d67a10a8b</p> <p>Deposit Address: bc1qu0l2dyppk3aasfs9nykaaklcdq3lqm0ednqrkxk</p> <p>Amount: \$487.75</p>
24	<p>Tx 2 08/06/20</p> <p>Tx Hash: b042e711113b5eb289f9905a1b49c79037872f2e38a1b7398f00a22e4f573420</p> <p>Deposit Address: bc1p3y5qytp6z7qmmhlxsxgpfwafwdsz8qhv6sduf2w654evx5htf2lqqyfrwy</p> <p>Amount: \$465.44</p>

⁴ <https://nexo.com/>

Further investigation shows Alexandra Roth had opportunity and access to transfer money out of K.W.'s cryptocurrency wallet without his knowledge or authorization

20. On August 9, 2024, Special Agent Derderian interviewed K.W. Detective Amando Tso from the Rio Rancho Police Department also conducted this interview. K.W.'s legal counsel participated in the interview telephonically. During the interview, Special Agent Derderian learned the history behind the creation of K.W.'s cryptocurrency wallet.

21. In particular, K.W. explained the cryptocurrency wallet in question was established and funded with 50 BTC in early 2023 as part of a trust fund intended as a tribute to K.W.'s late foster parents who adopted him at age six. K.W. had several siblings all adopted by the same foster parents. The intent of the fund was to give each adopted child a vote in how to use the fund. K.W. and E.W. decided to keep this fund secure in the afore-mentioned cold storage ledger account.⁵

22. K.W. explained his knowledge of how cold storage ledger devices can be accessed. K.W. stated he used an application called Ledger Live, which he logged into via his laptop. To confirm any wallet balances held on the device, K.W. would need to make a tethered cable connection between the device and his laptop, before being prompted for a device password. Once logged in on Ledger Live and into the cold storage device, K.W. could view balances of all wallets held on the device, see transaction history, and initiate new transactions. K.W. used cold storage to store the trust fund assets because he believed it was one of the safest

⁵ Further information about cold storage ledgers is available at the following web address: <https://www.ledger.com/academy/glossary/cold-storage>.

ways to store the cryptocurrency, as the fund was not vulnerable to internet-based attacks, unless the ledger device is physically tethered to an internet-connected device.

23. K.W. confirmed he knows Alexandra Roth to be a friend of his daughter, L.W. K.W. explained that L.W. and Roth live together, rent free, in a New Jersey home that K.W. and E.W. own.

24. K.W. further informed Special Agent Derderian that Roth and L.W. visited K.W. and E.W. in New Mexico for approximately three weeks from mid-July to early August 2024. K.W. noted that L.W. and Roth stayed overnight in different hotels or vacation rentals, but often spent time at K.W.'s and E.W.'s residence. On several occasions, K.W. went to the gym while L.W. and Roth remained at his residence.

25. During the interview, Special Agent Derderian asked K.W. what he believed happened to the 36 BTC that was transferred out of his cryptocurrency wallet. K.W. stated that he thought the money was accessed by Roth. K.W. explained that he had a conversation with his daughter, L.W., on August 6. According to K.W., his daughter approached him, noting the Coinbase account that L.W. and Roth were planning to use to setup three different funds supposedly to take care of E.W. was not accessible. L.W. asked K.W. to request the funds be made accessible and to "keep things in the family". K.W. told Special Agent Derderian that he was completely unaware of any trust fund they were attempting to establish and could not comprehend why they would need to split up a fund into three different funds to take care of one person.

26. K.W. stated that he learned L.W. and Roth wanted to put K.W. into a nursing facility, citing that he was too paranoid about personal security, but wanted to ensure they had enough money for themselves before doing so. K.W. affirmed that he had not been diagnosed

with any paranoia, schizophrenia, or related conditions, but was fearful for his safety and E.W.'s safety due to the recent burglary, as well as a death threat and ongoing harassing calls from unidentified people.

27. According to K.W., he remembered being at basketball practice for several hours on July 26, which was the day the BTC was stolen. K.W. explained he normally leaves his computers in his home office unlocked.

28. K.W. told Special Agent Derderian that, as of the time of this interview, he had not been able to find one of his Ledger Nano X cold storage devices since July 26. He also stated he had not seen a paper file consisting of all notes he had shared with the FBI since April 2024 when he previously spoke to me about the attempted breaches of one of his cryptocurrency accounts.

29. K.W. stated he last spoke with L.W. on August 6 but had not received responses from her since and was unsure of her whereabouts at the time of the interview.

30. Separately, Special Agent Derderian has reviewed property records on file with the register of Essex County Register's Office in New Jersey.⁶ These records show K.W. and E.W. purchased real property at 41 Central Avenue, Montclair, New Jersey on or about May 31, 2018. The records received from Coinbase also show this address as the residence of the account holder, who is listed as Roth.

31. Special Agent Derderian is further informed by Detective Tso that she visited the home of K.W. and E.W. in Rio Rancho on August 5, 2024, where she observed L.W. and Roth present at the location. According to Detective Tso, L.W. and Roth appeared to be very

⁶ <https://press.essexregister.com/prodpress/clerk/ClerkHome.aspx?op=basic>

interested in understanding exactly how much law enforcement knew about the alleged cryptocurrency theft and a prior burglary at the location on or about July 8, 2024.⁷

CLAIM FOR RELIEF

32. The United States incorporates by reference the allegations in paragraphs 1 through 31 as though fully set forth herein.

33. 18 U.S.C. § 981(a)(1)(C) provides, in pertinent part, for the forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1030 or conspiracy to commit such offense.

34. Defendant Property constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 1030 or conspiracy to commit such offense and is thus subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C).

WHEREFORE: Plaintiff seeks arrest of Defendant Property and forfeiture of same to Plaintiff, determination of the validity and priority of claims of the Claimants and any Unknown Claimants to the Defendant Property, costs, and expenses of seizure and of this proceeding, and other proper relief.

Respectfully submitted,

ALEXANDER M.M UBALLEZ
United States Attorney

Electronically Filed on February 7, 2025
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⁷ K.W. has informed Special Agent Derderian eight hard drives were stolen from the home and a laptop computer was moved from its regular location to a different area. This matter is still under investigation.

28 U.S.C. § 1746 DECLARATION

I am a Special Agent with the Federal Bureau of Investigation who has read the contents of the Complaint for Forfeiture *In Rem* to which this Declaration is attached; and the statements contained in the complaint are true to the best of my knowledge and belief.

I declare under penalty of perjury and the laws of the United States of America that this Declaration is true and correct, except as to matters stated on information and belief, and as to those matters, I believe them to be true.

Dated: 2/7/2025

A handwritten signature in black ink, appearing to read 'Tyler Derderian', is written over a horizontal line.

Special Agent Tyler Derderian
Federal Bureau of Investigation